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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA,
17 SAN FRANCISCO DIVISION

18
19 GOOGLE LLC,
20 Plaintiff and Counter-defendant,
21 v.
22 SONOS, INC.,
23 Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT
ROBERTS IN SUPPORT OF SONOS,
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL RE MOTION
TO STRIKE**

I, Clement Roberts, declare as follows and would so testify under oath if called upon to do so:

1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good standing of the Bar of the State of California. I make this declaration based on my personal knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set forth herein.

8 2. I make this declaration in support of Sonos's Administrative Motion to File Under
9 Seal in connection with Sonos's Motion to Strike Portions of Google's Expert Invalidity and
10 Noninfringement Reports ("Sonos's Motion").

11 ||| 3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEAL	DESIGNATING PARTY
Exhibit J to Sonos's Motion	Portions outlined in red boxes	Sonos and Google

16 4. The portions of Exhibit J to Sonos’s Motion to Strike outlined in red boxes contain
17 references Sonos’s confidential business information and trade secrets, including terms to a
18 confidential agreement that is not public. Disclosure of this information would harm Sonos’s
19 competitive standing by giving Sonos’s competitors highly sensitive information about Sonos’s
20 business dealings with other entities. A less restrictive alternative than sealing the portions of
21 Exhibit J to Sonos’s Motion to Strike, as indicated in the table above, would not be sufficient
22 because the information sought to be sealed is Sonos’s confidential business information and
23 trade secrets and is integral to Sonos’s legal arguments.

24 I declare under penalty of perjury that the foregoing is true and correct to the best of my
25 knowledge. Executed this 27th day of January, 2023 in Belvedere, California.

/s/ Clement S. Roberts
Clement S. Roberts